

EXHIBIT A

REGULATORY RESOLUTIONS

Receivers | Examiners | Monitors

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August 16, 2024

Via Email (thoover@hooverdurland.com)

The Bush Lake Trust
c/o Timothy W. Hoover
Hoover & Durland LLP
561 Franklin Street
Buffalo, NY 14202

Re: *Consumer Financial Protection Bureau, et al. v. StratFS, LLC, et al.*
U.S. District Court (W.D.N.Y.), Case No. 1:24-cv-00040-EAW-MJR
Determination of Additional Receivership Defendant

Dear Mr. Hoover:

As you are aware, on January 11, 2024, the U.S. District Court for the Western District of New York issued a Temporary Restraining Order with an Asset Freeze, Appointment of a Receiver, and Other Equitable Relief (“TRO”) in the above-referenced case, appointing me as the temporary receiver of the Receivership Defendants. On March 4, 2024, the Court entered the attached Preliminary Injunction (“PI”), which continues the terms of the TRO and asset freeze and confirms my appointment as Receiver.

Receivership Defendants

The Preliminary Injunction defines “Receivership Defendants” as the Corporate Defendants¹ and their subsidiaries, affiliates, divisions, successors, and assigns, *as well as any other business related to the Defendants’ debt-relief services and which the Receiver has reason to believe is owned or controlled in whole or in part by any of the Defendants* and includes fictitious names under which they do business. “Receivership Defendants” also includes Twist Financial, LLC,

¹ The Preliminary Injunction defines “Corporate Defendants” to mean Stratfs, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC, Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LL, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, Whitestone Client Services, LLC, and their successors, assigns, affiliates, or subsidiaries, and each of them by all names each might be known, including any fictitious business entities or business names created or used by these entities.

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Duke Enterprises, LLC, Blaise Investments, LLC, and Relief Defendants the Blust Family Irrevocable Trust through Donald J. Holmgren, Trustee, Lit Def Strategies, LLC, and Relialit, LLC, and their subsidiaries, affiliates, divisions, successors, and assigns, *as well as any other business related to the Defendants' debt-relief services and which the Receiver has reason to believe is owned or controlled in whole or in part by the Relief Defendants included in this definition*, and includes fictitious names under which they do business. See PI, Definitions, ¶ N (emphasis added).

Receivership Property

The Receiver is directed and authorized to “[r]etain exclusive custody, control, and possession of all Assets, Documents, and Electronically Stored Information of, or in the possession, custody, or under the control of, the Receivership Defendants, wherever situated” including all Assets of the Receivership Defendants and all Documents and Electronically Stored Information. PI, Sections IX.B. and XIV.A.1.-2., respectively.

Determinations Regarding Receivership Defendants

I previously determined that Fidelis Legal Support Services, LLC (“Fidelis”) qualifies as a Receivership Defendant. See Letter of February 25, 2024. Fidelis has challenged that determination, and this challenge will be determined by the Court in the near future. Recently, Fidelis was named as a Defendant, while The Bush Lake Trust and Cameron Christo were named Relief Defendants, in the Second Amended Complaint. The Bush Lake Trust owns Fidelis and, as such, it also qualifies as a Receivership Defendant.

I do not intend to take steps to enforce this determination until a decision is made on the pending Fidelis motion.

Very truly yours,



Thomas W. McNamara

TWM:jej

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